

PSA 7 Aging and Adult Services Bureau, County Employment and Human Services Department

MONITORING REPORT

November 2-5, 2009



California Department of Aging (CDA) Staff

An onsite assessment of the Aging and Adult Services Bureau (AASB), County Employment and Human Services Department was conducted by CDA staff from November 2-5, 2009. The following CDA Staff were present:

Violet Henry	Coach	Long Term Care and Aging Services Division-Team A
Eura Trent	Aging Programs Specialist	Administrative Services
Maria Olmos	Fiscal Program Specialist	Fiscal Program Services
Joel Weeden	FCSP Specialist	Title III-E Family Caregiver
		Support Program
Andrea Bricker, R.D.	Public Health Nutritionist	Title III C Elderly Nutrition
		Program and Title III D
		Disease Prevention and
		Health Promotion
Scott Crackel	Aging Programs Specialist	Title III-B Supportive
		Services, Information and
		Assistance and Disaster
		Preparedness
Steve Miars	HICAP Program Specialist	Health Insurance
		Counseling and Advocacy
		Program (HICAP)

Monitoring Report

Throughout the monitoring report, either Aging and Adult Services Bureau, County Employment and Human Services Department (AASB) or Area Agency on Aging (AAA) is used to refer to the Aging and Adult Services Bureau, County Employment and Human Services Department. In every instance, the two terms are synonymous. CDA staff monitored administrative, fiscal, and specific program standards required by the Older Americans Act (OAA) and Older Californians Act (OCA). This report includes:

- Recap of the standards monitored during the visit;
- Recognition of any identified best practices or models of service delivery that will be shared with the aging network by a notice posted on CDA's website;
- Findings and required actions to be taken by the AASB to correct specific findings associated with the monitoring visit; and
- Corrective Action Plan to be completed by AASB and submitted to CDA.

RECAP/OVERVIEW OF MONITORING VISIT

This section provides a recap of the standards reviewed during the monitoring visit and the recognition of the AAA staff that assisted CDA to accomplish its work.

AAA Administrative Review

Governing Board

Eura Trent and Violet Henry met with Dorothy Sansoe, Senior Deputy County Administrator, to determine if the Governing Board understands its role in development and coordination of community-based system of care for older individuals living within the Planning and Service Area (PSA).

The Board of Supervisors (BOS) serves as the Governing Board for the AAA. The Governing Board is made up of five elected members serving Contra Costa County. The BOS has an established working relationship with AAA executive staff. BOS host regularly scheduled public meetings, participate in public hearings and occasionally attend Advisory Council meetings.

Advisory Council

Eura Trent and Violet Henry met with Gerald Richards, Advisory Council Chair, to determine if the Advisory Council is visible in community leadership in addressing the needs and concerns of older individuals living within the PSA.

The Advisory Council is comprised of 40 active members and broken up into five standing workgroups: Housing, Legislative, Mental Health, Planning and Transportation. Each council member is assigned to a workgroup and is committed to addressing the needs of the seniors in the community. The Advisory Council has the opportunity to advise the AAA on all matters related to the development and administration of the Area Plan.

Staffing and Organization

Eura Trent used CDAs staffing and organization tool to determine if the AAA has an adequate number of program staff designated to manage the daily operation and administrative functions of the AAA. Ms. Trent reviewed duty statements, desk manuals, and the Personnel Procedures manual. Personnel practices and procedures have been established and are well maintained.

Procurement/Contract Process

Eura Trent and Violet Henry met with Ruth Atkin, Senior Staff Assistant III and Scott Danielson, Senior Staff Assistant III, to determine if the AAA had established systematic procedures for the award and administration of contracts through an open and competitive process. The County Employment and Human Services Department assigns the AASB as the liaison within the Department's contract unit to help ensure Request for Proposal (RFP) or Request for Invitation (RFI) and provider contracts contain all required components and are executed in a timely manner. Completed

contracts are retained in the AAA's files. There were no appeals or grievances as a result of the RFP process.

Management of Service Providers

Eura Trent and Violet Henry met with Ruth Atkin and Scott Danielson, Senior Staff Assistant III, to determine if the AAA effectively communicates with, disseminates policies to, and monitors its service providers. The AAA distributes information to a network of non-profit service providers through regular email communication, service provider training, and technical assistance. Ms. Trent reviewed the current monitoring schedule and contracted service provider files. The AAA conducts onsite monitoring visits and monitors its service providers contracted activity levels on a regular basis and makes adjustments when necessary. If service units fall below expectations, the AAA will offer training or recommend the service provider implement a plan to ensure the contracted service units are met.

Data Reporting

Eura Trent met with Jamie Ray, Secretary and Scott Saari, AAA IT Staff, to ensure the AAA has a procedure in place for collecting and reporting unduplicated client counts and demographics for non-registered OAA programs. The AAA uses the Q Continuum data reporting system and maintains the provider user manual for Q, NAPIS and CARs data collection systems. Data is verified for accuracy by both the data administrator and program staff prior to monitoring. Technical assistance is scheduled as needed with AAA service providers to assist with reporting issues and help maintain timely submission of quarterly reports.

AAA Fiscal Review

Maria Olmos met with Leona Hartmann-Patterson, Fiscal Officer, to discuss the financial reporting system of the AAA. Each standard of the AAA Fiscal Review tool was covered. Several reported expenditures were traced back to originating invoices and supporting documents; and service provider contract language was reviewed for fiscal requirements. Contra Costa's Auditor Controller's office processes all checks for the AAA after fiscal and program staff review and approve invoices. AAA staff uses Excel spreadsheets and the county's financial management database system to track expenditures (monthly and year-to-date), funding sources, and to complete monthly reporting to CDA.

Specific Program Reports—Older Americans Act Programs

Title III B-—Supportive Services (General)

Scott Crackel and Violet Henry met with Ruth Atkin, Senior Staff Assistant III to discuss CDAs Title IIIB Supportive Services tool that was completed prior to the monitoring visit. The AAA utilizes its own monitoring tools to oversee its Title IIIB programs, which were furnished for review. Ms. Atkin escorted Scott Crackel and Violet Henry to a Title IIIB Supportive Services provider in Walnut Creek. They met with Sandy Warren, Executive Director and his assistant, Ms. Amazamora. Senior Outreach receives approximately \$24,000 per year from the AAA, and has been the AAA's Title IIIB Supportive Services provider for nearly 35 years.

Title III B-—Information and Assistance (I&A)

Scott Crackel interviewed Betty Wilgus, I&A Program Manager to review the I&A monitoring tool. I&A is a direct function at the AAA headquarters and staffs four full-time employees who report to Ms. Wilgus.

During the monitoring visit, Mr. Crackel called the 1-800-510-2020 line during the day and in the evening. During the daytime, the call was triaged by an I&A staff person, who inquired about the need and asked the age of the person in need before offering several referral telephone numbers for assistance. In the evening, the calls go to AASB voicemail.

Mr. Crackel also checked the local telephone books for references to senior services. The Tri Valley Area 2008-2009 Directory of White and Yellow pages and AT&T Yellow Pages 2007-2008 listed the 1-800-510-2020 number under Area Agency on Aging, but not under Senior Services.

The AAA utilizes a computerized-database for its resource directory and distributes custom-generated (printed) pages from it on demand. The directory is not distributed in its entirety. All calls are documented on commercial IRis brand I&A software. IRis is a database specifically designed to help organizations manage their I&A activities. The IRis Intake Form is comprehensive and is capable of documenting unmet needs and follow-up.

Disaster Preparedness

Scott Crackel interviewed Scott Danielson, Senior Staff Assistant III and Disaster Preparedness Coordinator, Betty Wilgus, I&A Program Manager and Carol Sheridan, I&A Representative, regarding the AAA disaster preparedness efforts. The AAA has a relationship with the Contra Costa County Offices of Emergency Services (OES). The AAA, OES and other safety-stakeholders in the county conduct mock instructional drills based on hypothetical scenarios the area is likely to face in the coming years; such activities promote interaction and collaboration.

Contra Costa County stakeholders have developed a collaboration called, Organizations Networked for Emergencies in Contra Costa County (ONECCC). This consortium of members focuses on ensuring that stakeholders are prepared for potential disasters. Mr. Danielson travels throughout the County visiting stakeholders, promoting disaster preparedness, and conducting training to service providers, at senior centers, brown bag sites, and community organizations. The AAA has distributed approximately 2,000 disaster preparedness kits, which are contained in individual fivegallon plastic buckets. The kits containers function as makeshift toilets, and hold supplies designed to keep an individual safe and healthy up to 72 hours.

Title III C-—Elderly Nutrition Program (ENP)

Andrea Bricker, R.D., met with Liz Vargas, R.D., Program Director; Paul Kraintz, Public Health Division Administrator; Stella Wu Chu, AAA R.D. and Scott Danielson, Senior Staff Analyst III. An onsite inspection of the outreach contractor West County Meals on

Wheels, conducted by Ms. Bricker, consisted of reviewing home-delivered meal (HDM) program client files including client assessment, eligibility, intake forms and donation information. The central kitchen, managed by Bateman Senior Dining, was monitored along with two meal sites; the Antioch Senior Center and Richmond Senior Center.

Title III D-—Disease Prevention and Health Promotion

Andrea Bricker, R.D., met with Bette Wilgus, I&A Program Manager and Leah McIntosh, Outreach/Volunteer Coordinator to discuss the AAA's Title IIID Health Promotion and Disease Prevention and Medication Management Program. The AAA provides several activities under the Title IIID program. The AAA promotes active aging through the use of health, fitness and nutrition experts, community resources, and exercise demonstration classes. The AAA distributes pedometers, Dyna-Bands, and resistance tubes to participating seniors at senior health fairs and senior centers throughout the County. Additionally, the Falls Prevention Program of Contra Costa County, distributed "Sit and Be Fit" exercise videos and falls prevention literature to seniors.

The Contra Costa Aging and Adult Services Medication Management program collaborated with the Food and Drug Administration who provided medication management handouts. The handouts and pill boxes were distributed to seniors throughout Contra Costa County at senior centers, senior housing complexes, senior health fairs, and libraries.

Title III E-—Family Caregiver Support Program (FCSP)

The Family Caregiver Support Program is primarily subcontracted service of the AAA. Joel Weeden met with Scott Danielson, Senior Staff Services Assistant III who facilitated three field visits for FCSP review. These Title IIIE grantee visits help CDA staff understand how the AAA-funded FCSP systems of caregiver support have unfolded under its leadership, and the AAA's compliance with service procurement requirements and grantee oversight responsibilities. The visits also provide an opportunity to address provider questions, explore system enhancements, and highlight best practices. Productive discussions were held with:

- John Muir Health Foundation for Caring Hands Volunteer Caregivers Program Program Manager Carol Louisell and Volunteer Coordinator Linda Groobin.
- Jewish Family & Children's Services of the East Bay Director of Refugee & Immigrant Services Barbara Nelson, Russian Program Coordinator & Case Manager Lila Katz, Bosnian Program Coordinator & Case Manager Enisa Arifovic, and Afghan Program Coordinator & Case Manager.
- Meals and Wheels by Senior Outreach Services Executive Director Sandy Warren, Contracts Manager Ana Zamora, and Falls Prevention Program Manager Gennifer M. W. Mountain.

Although Title IIIE funds were not allocated to the AAA's direct I&A program, the AAA included the program in its FCSP Total Budgeted Costs. Therefore, FCSP Caregiver

I&A outcomes must correlate with the FCSP budgeted portion of I&A operational costs. Bette Wilgus, I&A Program Manager, provided FCSP-related Fiscal Year 2008-09 performance based on both number of contacts and number of problems address. Mr. Weeden also interviewed Rosalinda Camacho, I&A Program Staff, on criteria used to distinguish FCSP I&A calls from the usual Title IIIB Senior Supportive Services calls or other County programs.

<u>Specific Program Reports—Older Californians Act Programs</u> Health Insurance Counseling and Advocacy Program (HICAP)

Steve Miars met with Leah McIntosh, HICAP Program Outreach/Volunteer Coordinator. During the visit, Mr. Miars completed the HICAP Monitoring tool and reviewed random HICAP client intake forms, as well as HICAP Counselor records, for the purpose of evaluating the HICAP program for FY 09/10.

BEST PRACTICES OR MODELS OF SERVICE DELIVERY

Best practices or Models of Service Delivery discovered during the monitoring of AAA are being identified by CDA to share with the aging network and other agencies or individuals interested in developing senior services in their community.

Listed below are either Best Practices or Models of Service Delivery identified during the monitoring visit conducted by CDA and discussed at the Exit Conference. Best Practices or Models of Service Delivery along with the AAA staff you select to provide guidance to individuals seeking information on specific activities, programs, and services, will be placed on CDA's website.

<u>Specific Program Reports—Older Americans Act Programs</u> Disaster Preparedness

Distribution of extensively-equipped emergency preparedness kits. The emergency kit is housed in a 5-gallon plastic container and is filled with several basic first aid and survival items and food/water, more than sufficient enough to maintain health and well being for the individual for 72 hours. The kit's container can even be used as a makeshift toilet, minimizing hazards and disease potential during and after the disaster event. It is the best-equipped kit I've yet seen among the AAAs.

<u>Specific Program Reports—Older Californians Act Programs</u> Health Insurance Counseling and Advocacy Program (HICAP)

The Council on Aging HICAP program annually prepares and conducts twenty "Welcome to Medicare" Fall/Winter community education presentations. Each two hour in-depth presentation covers Medicare Parts A, B, C, and D, how to supplement Medicare and when and how to buy a Prescription Drug Plan. These presentations are strategically timed for the annual election period for Prescription Drug Plans and Medicare Advantage Plans from November 15th – December 31 and the general enrollment period from January 1st – March 31st. The educational presentations provide valuable Medicare information to beneficiaries explaining each of the Medicare benefits with many side-by-side comparisons between programs, benefits and plans. The presentation materials are very professional, yet "consumer friendly" allowing for live questions, answers, and the ability to arrange for personal one-on-one counseling to make informed choices.

FINDINGS REQUIRING CORRECTIVE ACTION

Included below is a formal description of findings that led to the corrective actions detailed in the Report of Required Corrective Actions (see attached) presented at the Exit Conference conducted by CDA on September 24, 2009. For your convenience, specific corrective actions to be taken by the AAA to address each finding are summarized in a Corrective Action Plan (CAP) format that is included as part of this report. The CAP will be transmitted electronically to the AAA to ease completion and submission to CDA.

AAA Administrative Review

Advisory Council

The Advisory Council should represent the percentage of the Planning and Service Area's (PSA) older population and race and ethnicity for each of the following categories: [CCR Section 7302(a)(12)(D)]

- 1. White
- 2. Hispanic
- 3. Black
- 4. Asian/Pacific Islander
- 5. Native American/Alaskan Native
- 6. Other

Corrective Action: Recruit Council members that represent the ethnic composition of the community and fill vacancies as required by the Advisory Council bylaws.

AAA Fiscal Review

The fiscal officer has developed procedures for financial reporting, internal controls, audit resolution, etc. Although the Fiscal Officer follows general State and county guidelines for acceptable financial management systems, there is no desk manual outlining how these guidelines are applied to OAA and OCA programs. Instructions on how the fiscal officer can carry out his/her job are needed. AAAs shall establish administrative practices that include the development and maintenance of written procedures for carrying out all responsibilities and requirements under State and federal regulations. [Title 22, Division 1.8, Article 2, Section 7250 (b)(4)]

Corrective Action: Develop a Fiscal Officer Desk Procedures manual to reflect how the fiscal officer applies acceptable standards for financial management systems to AAA programs.

Specific Program Reports—Older Americans Act Programs

Title III B-—Information and Assistance (I&A)

I&A staff members are not consistently completing follow-ups and documenting outcomes of referrals when clients are linked to services. [Title 22, CCR Sections 7527, 7533, 7537, and 7545]

Corrective Action: Ensure adequate staff resources are allocated to complete and document a follow-up outcome for each client that is referred to a needed service, within 30 days of the referral, to ascertain if the individual's service needs were met.

Addresses and days/hours of operations are not included in all public information on brochures. [OAA Title 22, CCR Sections 7531(b)(1) and 7531(b)(2)]

Corrective Action: Ensure addresses and days/hours of operation are included in all public information on brochures of OAA Programs.

Title III C-—Elderly Nutrition Program (ENP)

A review of the donation letter from the West Contra Costa County Meals on Wheels (MOW) program found donation requests are in the form of invoice/statements. The MOW Participant Registration form has a section requesting income and suggesting a donation amount based on income. This section asks participants to make an "agreed donation". The request to make an "agreed donation" is coercive. **Repeat Finding** [OAA §315 (b)]

Corrective Action: Ensure that invoice/statements are not sent to HDM clients soliciting payment for service.

A review of MOW by Senior Outreach Services a meals subcontractor found their website regarding "Frequently Asked Questions about Receiving Meals" "What is the Cost?" states "The suggested contribution is on the sliding scale from \$2 per meal to \$8.57 per meal based on income (one meal per day)". This statement implies that the individual's income and not the income rates of the community are considered to determine the suggested donation rate. When developing the contribution amount the income rates of the older individuals in the community and the provider's other sources of income shall be considered. [OAA §315 (b)(3) and CCR §7638.9 (b)]

Corrective Action: Ensure service providers discontinue the use sliding scale donation rates based on an individual participant's income.

A review of MOW by Senior Outreach Services, Meals on Wheels of Contra Costa, Inc websites, and Meals on Wheels of Contra Costa program flyer did not clearly inform participants that the suggested donation is purely voluntary and the participant will not be denied participation because of failure or inability to contribute to the cost of the service. The AAA shall ensure that each service provider will provide each recipient with opportunity to voluntarily contribute to the cost of the service and to clearly inform each

recipient that there is no obligation to contribute and the contribution is purely voluntary. No eligible individual shall be denied participation because of frailty or inability to contribute. **Repeat Finding** [OAA §315 (b)(A) and (B) CCR 7638.9 (d)]

Corrective Action: Inform HDM and congregate meals clients that services will not be denied to any individual who does not contribute to the cost of the service.

Corrective Action: Ensure that all requests for donations include a statement to clearly inform each participant there is no obligation to contribute and the contribution is purely voluntary.

A review of the West Contra Costa County Meals on Wheels program found that they are tracking participants names and donation amounts in an accounts receivables format. The area agency on aging shall ensure that each service provider will protect the privacy and confidentiality of each recipient with respect to the recipients contribution or lack of contribution. **Repeat Finding** [OAA §315 (b)(4)(C)]

Corrective Action: Eliminate accounts receivables for HDM clients.

A review of the contribution process at the Antioch Senior Center found that the donations are collected in an unsecured cardboard box. The nutrition services provider shall establish written procedures to protect contribution and fees from loss, mishandling, and theft. [CCR §7638.9 (f)]

Corrective Action: Ensure voluntary contributions collected are placed in a locked box.

At the Richmond Senior Center, CDA staff observed a participant requesting change for a five dollar bill. The volunteer returned three dollars to the participant. The participant was not given the opportunity to determine what he could contribute. CDA staff also observed a participants donation being collected by the site manager and placed into the locked box. The provider shall ensure that the amount of the eligible participant's contribution is kept confidential. [CCR §7638.9 (e)]

Corrective Action: Ensure confidentiality of the participant donation at the Richmond Senior Center.

A review of the Area Plan process with Scott Danielson and Stella Wu Chu determined that the Contractor was included in the Area Plan process but the AAA R.D. was not consulted. The AAA registered dietitian shall participate in the Area Plan development related to nutrition services. [CCR §7634.3 (c)]

Corrective Action: Ensure the AAA R.D. participates in the Area Plan development and update process related to ENP issues.

A review of the congregate nutrition program at the Richmond Senior Center found that staff received a hamburger at 129°F and placed it into a hot oven. When the hamburger was served the temperature was not checked to ensure it was reheated to the proper temperature. Hot and cold holding of potentially hazardous food when time is used as the public health control, potentially hazardous food shall be maintained at or above 135°F, or at or below 41°F. Potentially hazardous food that is received hot shall be at a temperature of 135°F or above. [CRFC 113996 (a) and CRFC 114037 (d)]

Corrective Action: Ensure the Richmond Senior Center maintains food temperatures at or above 135°F.

A review of the satellite kitchens at the Antioch Senior Center and the Richmond Senior Center found that cold foods are often stored in the refrigerators before congregate meal service. To ensure that foods will be maintained at the appropriate temperature it is essential that refrigerator and freezer logs be maintained if they are used to maintain cold/frozen foods. Potentially hazardous food shall be maintained at or above 135°F, or at or below 41°F. [CCR 113996 (a)]

Corrective Action: Ensure refrigerator/freezer log sheets are maintained on all refrigerators and freezers to verify adequate temperatures where food is held at satellite kitchen sites.

CDA staff observed Bateman Catering staff members touching their face and hair prior to tray service. Staff members did not wash their hands after touching their face and hair. Employees shall wash their hands after touching bare human body parts other than clean hands and clean, exposed portions of arms. [CRFC 113953.3]

Corrective Action: Ensure employees of Bateman Catering wash their hands after contact with their face or hair.

A review of the ENP provider websites found that the Meals on Wheels of Contra Costa, Inc and Meals on Wheels by Senior Outreach Services websites, program literature and AAA ENP policy and procedure manual has not updated menu requirements from Recommended Dietary Intakes (DRIs) to Dietary Reference Intakes (DRIs) and that meals comply with the Dietary Guidelines for Americans.

Corrective Action: Ensure provider websites, program literature and policy and procedure manuals reflect current changes to laws and regulations.

Title III E-—Family Caregiver Support Program (FCSP)

FCSP activities and services are delivered in collaboration with other programs, the AAA and/or its grantees shall have a system in place for distributing the fair share of costs for each program in accordance with benefits received. They are also to maintain documentation to support the reasonable proportion of costs. According to the Area Plan Budget for FCSP Direct Services, the AAA allocates six percent of I&A Social

Worker staff time to FCSP Information Services. However, this FCSP related I&A cost must be budgeted under FCSP Access Assistance. CDA issued FCSP service matrix service unit definitions. In reviewing FY 08-09 FCSP annual performance data, the AAA direct I&A unit statistics showed that four of the 26,269 caller contacts were identified as Title IIIE Caregivers, or less than 0.02 percent of the total callers. When tracking the number of problems addressed within total calls, 167 problems were identified as caregiver-related, or about 0.34 percent of all problems addressed by AAA I&A staff. The Cost Allocation Plan used by the AAA does not appear to correlate with the benefits received by FCSP eligible caregivers for FCSP eligible Access Assistance services. [2 CFR 230 – Appendix A(4)(a)(2) and OAA 373(b)(2)]

Corrective Action: Reassess the AAA Cost Allocation Plan for prorating AAA direct I&A costs to ensure the FCSP fair share budgeted cost is based on FCSP-eligible I&A benefits to be received by FCSP-eligible caregivers.

The Request for Interest (RFI) issued by the AAA for mid-year 08-09 procurement of FCSP Supplemental Services did not specify minimum performance expectations. This RFI contained the CDA issued FCSP Service Matrix service unit definitions and measurement criteria for Assistive Devices for Caregiving and Home Adaptations for Caregiving to be used by applicants in determining all agency costs per service unit. However, the single RFI respondent expanded the unit contents to include an Occupational Therapist needs assessment and follow-up counseling, which are budgeted and measured under one of the other federally-mandated categories. As a result, actual FCSP program costs and performance outcomes reported by the AAA do not accurately match the benefits received through the use of federal Title IIIE funds. An Invitation for Bid shall contain a statement of the minimum number of services to be provided and the definition of those unit measurements under the terms and conditions of the award. [OAA 373(e)(2), OAA 373(b) and CCR 7354(b)(8)]

Corrective Action: Procure services, track program costs, and report performance in accordance with federal FCSP service categories and correlating State standards.

Title IIIE federal share of FCSP Total Budgeted Costs will enable AAAs, or the entities they contract with, to provide multifaceted systems of support services for family caregivers and older relatives caring for a child. For the purpose of Title III, the term "family caregiver" is defined to mean an adult individual (e.g., family, neighbor, or friend) who is the informal (i.e., unpaid) provider of in-home and community care to an older individual or individual of any age with Alzheimer's disease or related-disorder. For the provision of FCSP Supplemental Services, Meals on Wheels by Senior Outreach Services stated the following in its proposal for the RFI: "We recognize that the criteria for this grant is about helping caregivers provide care to seniors. We can incorporate these requirements into our current procedures." However, during the site visit the Falls Prevention Program Manager implementing the FCSP contract described a service and provided documentation that focused on the assessed needs of the senior; and appeared to be continuing the use of program criteria developed for a previously funded

Falls Prevention Program. For example, the evaluation form used by the Occupational Therapist was not revised to focus on environmental stressors that should be addressed to reduce caregiver strain, and facilitate and enhance to caregiving role. [OAA 373(a) and OAA 302(3)]

Corrective Actions: Ensure provision of Title III E supported FCSP activities are directed towards meeting the assessed needs of family caregivers responsible for the in-home and community care to an older individual.

When serving FCSP eligible caregivers of older adults, priority shall be given to: (a) caregivers providing care to individuals age 60 or older with a cognitive impairment, and (b) caregivers age 60 or older having the greatest social and economic needs. These OAA service priorities help meet the intent of having FCSP respond quickly and effectively to prevent potential collapse of a fragile caregiver support arrangement, thereby preventing institutional placement and the potential spend down to Medi-Cal, as specified in the first objective of the U.S. Administration on Aging 2007-2012 Strategic Action Plan. During the onsite visits with John Muir Health Foundation for Caring Hands Volunteer Caregivers Program and Meals and Wheels by Senior Outreach Services, both FCSP providers reported maintaining a waiting list of caregivers in need of FCSP services. The second provider acknowledged that some caregivers placed on the waiting list may never be served due to limited resources. However, both acknowledged that exceptions had been made based on further undocumented information on the caregiver. [OAA 372(b)(1) and 373(c)(2)]

Corrective Action: Ensure FCSP providers document the family caregiver assessed need for services, which will justify the provision and prioritization of limited FCSP services.

FCSP Respite Care and Supplemental Services to caregivers caring for older adults that meet the definition of "frail." As specified, "frail" means the older care receiver cannot perform at least two Activities of Daily Living (ADLs) or, due to cognitive impairment, requires substantial supervision. The California Aging Reporting System (CARS) ADL specifications cover eating, bathing, toileting, transferring in and out of a bed or chair, walking, dressing. This additional OAA restriction ensures effective targeting of the limited FCSP "service provision" resources in order to assist those unpaid family caregivers with overwhelming care responsibilities. While CARS profile data tracking does not directly account for cognitive impairment, there is a general understanding the "substantial supervision" will correlate with two or more identified ADLs. During the onsite visits with John Muir Health Foundation for Caring Hands Volunteer Caregivers Program and Meals and Wheels by Senior Outreach Services, both FCSP providers mentioned they were not aware of this additional eligibility requirement for the delivery of Respite or Supplemental Services. [OAA 373(c)(1)(B) and OAA 102(a)(22)(A)(i) and (B)]

Corrective Action: Limit the provision of FCSP Respite Care and Supplemental Services only to those family caregivers responsible for the in-home and community care of a frail elder unable to perform at least two ADLs.